## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

DAVITA M. KEY,	)
Plaintiff,	) )
V.	) CIVIL CASE NO. 2:19-cv-767-ECM
DYNAMIC SECURITY, INC.	) )
Defendants.	)

## <u>MOTION FOR JUDGMENT AS A MATTER OF LAW</u>

Defendant Dynamic Security, Inc. ("Dynamic"), pursuant to Rule 50, Fed. R. Civ. P., hereby renews its Motion for Judgment as a Matter of Law (Doc. 182) filed after the close of Plaintiff's case, requesting this Court enter a verdict directing dismissal of the Plaintiff's claim of retaliation brought pursuant to 42 U.S.C. § 1981.

Respectfully submitted,

/s/ Wesley C. Redmond

Wesley C. Redmond Susan W. Bullock FordHarrison LLP 420 20<sup>th</sup> Street North, Suite 2560 Birmingham, AL 35203 wredmond@fordharrison.com

Phone: 205-244-5905

sbullock@fordharrison.com

Phone: 205-244-5904

## **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on 29<sup>th</sup> day of March, 2023, he electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to:

Heather Leonard Heather Leonard, P.C. 2105 Devereaux Cir., Suite 111 Birmingham, AL 35243

Leslie A. Palmer, LLC Palmer Law, LLC 104 23<sup>rd</sup> Street South, Suite 100 Birmingham, AL 35233

Counsel for Plaintiff

<u>/s/Wesley C. Redmond</u>
Wesley C. Redmond

WSACTIVELLP:13903312.1